

ANNEX B



LACKAWANNA County

For Prothonotary Use Only:

Docket No:

18CV5407

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Commencement of Action:

- ☒ Complaint ☐ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A
CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS
TRUSTEE FOR PRETIUM MORTGAGE
ACQUISITION TRUST

Lead Defendant's Name:

TERESA VELARDI or Occupants

Name of Plaintiff/Appellant's Attorney: Phelan Hallinan Diamond & Jones, LLP

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

Are money damages requested? : ☐ Yes ☒ No

Dollar Amount Requested: ☐ within arbitration limits
(Check one) ☐ outside arbitration limits

Is this a Class Action Suit? ☐ Yes ☒ No

Is this an MDJ Appeal? ☐ Yes ☒ No

Nature of the Case:

Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☐ Other: _____

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other _____
☐ Employment Dispute:
 Discrimination
☐ Employment Dispute: Other _____
☐ Other: _____

CIVIL APPEALS

- ☐ Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other _____

- ☐ Zoning Board
☐ Other: _____

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other: _____

REAL PROPERTY

- ☒ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure Residential
☐ Mortgage Foreclosure Commercial
☐ Partition
☐ Quiet Title
☐ Other: _____

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
☐ Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other: _____

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional: _____

SECTION A

SECTION B

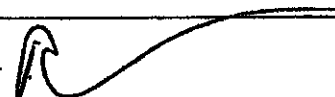
Court of Common Pleas of Lackawanna County

Civil Cover Sheet

FOR CLERK OF JUDICIAL RECORDS USE

Docket Number:

18CV5407

PLAINTIFF'S NAME WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PRETIUM MORTGAGE ACQUISITION TRUST		DEFENDANT'S NAME TERESA VELARDI or Occupants	
PLAINTIFF'S ADDRESS 15480 LAGUNA CANYON ROAD SUITE 100 IRVINE, CA 92618		DEFENDANT'S ADDRESS 612 SUNSET STREET CLARKS SUMMIT, PA 18411-2705	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 1	COMMENCEMENT OF ACTION	
AMOUNT IN CONTROVERSY In Excess of Jurisdictional Amount? _____ Yes _____ No	COURT PROGRAMS Arbitration Jury Non-Jury Petition Minor Court Appeal Statutory Appeals Other:		
CASE TYPE AND COSE (SEE INSTRUCTIONS) RP/EJ EJECTMENT			
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS) N/A			
TO THE CLERK OF JUDICIAL RECORDS: Please enter my appearance on behalf of Plaintiff Papers may be served at the address set forth below:			
NAME OF PLAINTIFF'S ATTORNEY OR PROSE PLAINTIFF		ADDRESS	
Phelan Hallinan Diamond & Jones, LLP		One Penn Center at Suburban Station 1617 JFK Blvd, Philadelphia, PA 19103	
PHONE NUMBERS: 215-563-7000	FAX NUMBER: 215-568-7616		
SUPREME COURT IDENTIFICATION NO. 318263		E-MAIL ADDRESS violeta.patori@phelanhallinan.com	
SIGNATURE: 		DATE 10/12/18	

MAUR B. KELLY
 CLERK OF JUDICIAL
 RECORDS CIVIL DIVISION
 2018 OCT 15 A 4:30
 LACKAWANNA COUNTY

**LACKAWANNA COUNTY COURT OF COMMON PLEASE
CIVIL COVER SHEET INSTRUCTIONS**

An attorney of prose party filing a document commencing any type of civil action shall file a properly complete Civil Cover Sheet. Copies of the Civil cover Sheet shall be attached to service copies of the document commencing the action.

PARTIES

Regardless of the type of action, the initiating party of parties shall be designated as Plaintiff or Plaintiffs and the responding party or parties shall be designated as Defendant or Defendants. Names of individuals shall be listed as last name, first name, middle initial. Full names of agencies and corporations shall be provided. Spouses shall be listed as separate parties unless the claim of one spouse is limited to a claim for consortium in which case the designation, et ux or et vir shall be used. Where there are more than three plaintiffs or defendants, a supplemental form listing the additional parties shall be attached to the Cover Sheet.

The section labeled "Remarks" is for procedural matters only. These may include such matters as related cases where consolidation might be advisable. Matters such as expected difficulty with service of process of the status of settlement discussions do not belong in this section.

CASE TYPE AND CODE DESIGNATION

FAM	Family Court	NGL/PI	Personal Injury
MCT	Minor Court Appeal	NGL/PREM	Premises Liability
LAG	Local Agency Appeal	NGL/PROD	Product Liability
LAG/MVS	Motor Vehicle Suspension	NGL/TT	Toxic Tort
LAG/ZB	Zoning Board Appeal	MGL/O	Other Negligence Action
LAG/O	Other Agency Appeals	MLP/D	Dental Malpractice
PCP	Proceedings commenced by Petition	MLP/L	Legal Malpractice
CNT	Contract Cases	MLP/M	Medical Malpractice
TORT/AB	Assault & Battery	MLP/O	Other Malpractice
TORT/LS	Libel & Slander	EQ	Equity
TORT/FR	Fraud	RP	Real Property
TORT/BF	Bad Faith	RP/EJ	Ejectment
TORT/WCP	Wrongful Use of Civil Process	RP/QT	Quiet Title
TORT/O	Other Torts	RP/MF	Mortgage Foreclosure
NGL/MVA	Motor Vehicle Accident	RP/ML	Mechanic's Lien
NGL/NF	No Fault Benefits	RP/PRT	Partition
		PP	Personal Property Actions

STATUTORY CAUSE OF ACTION

If the action is commenced, pursuant to statutory authority, the specific statute must be identified with full citation.

PENDING CASES

Previously filed related cases must be identified by caption and docket number or not consolidated.

Phelan Hallinan Diamond & Jones, LLP
Peter Wapner, Esq., Id. No.318263
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
peter.wapner@phelanhallinan.com
215-563-7000

WILMINGTON SAVINGS FUND SOCIETY,
FSB, D/B/A CHRISTIANA TRUST, NOT
INDIVIDUALLY BUT AS TRUSTEE FOR
PRETIUM MORTGAGE ACQUISITION TRUST
15480 LAGUNA CANYON ROAD SUITE 100
IRVINE, CA 92618

Plaintiff

v.

TERESA VELARDI or Occupants
612 SUNSET STREET
CLARKS SUMMIT, PA 18411-2705
Defendant

Attorney for Plaintiff

Court of Common Pleas

Civil Division

LACKAWANNA County

No.

18CV5407

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

North Penn Legal Services
507 Linden Street, 3rd Floor
Scranton, PA 18503
(570) 342-0184
Lawyer Referral Service


PH # 1024493

MAURI B. KELLY
LACKAWANNA COUNTY
2018 OCT 15 A 9 31
CLERKS OF JUDICIAL
RECORDS CIVIL DIVISION
We hereby certify
this to be a true and
correct copy of the
original filed of record

CIVIL ACTION - EJECTMENT

1. Plaintiff is WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PRETIUM MORTGAGE ACQUISITION TRUST.
2. Defendant is TERESA VELARDI or Occupants.
3. Plaintiff is the record owner of the premises located at 612 SUNSET STREET, CLARKS SUMMIT, PA 18411-2705, a legal description of which is contained within the Sheriff's deed attached hereto, made part of hereof, and marked as Exhibit "A".
4. Plaintiff became the owner of said premises as a result of the foreclosure and judicial sale by the Sheriff of LACKAWANNA County, on 06/12/2018, as evidenced by the Sheriff's deed recorded 09/18/2018 in the Office of the Recorder of LACKAWANNA County in Instrument Number 201814786.
5. Plaintiff by virtue of the above, is the record owner of said premises, and is entitled to possession thereof. The defendant is occupying the said premises without right and so far as the Plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the said premises from the said defendant who has refused to deliver up possession of same.

WHEREFORE, Plaintiff seeks to recover possession of the Premises.



Peter Wapner, Esq., Id. No.318263
Attorney for Plaintiff
Phelan Hallinan Diamond & Jones, LLP

MAURI B. KELLY
LACKAWANNA COUNTY
2018 OCT 15 A 9:31
CLERKS OF JUDICIAL
RECORDS CIVIL DIVISION

EXHIBIT “A”



EVIE RAFALKO MCNULTY
 Lackawanna County Recorder of Deeds
 Gateway Center
 135 Jefferson Avenue
 Scranton, Pennsylvania 18503

This is a certification page

This page is now part of this legal document - DO NOT DETACH



INSTRUMENT #: 201814786

Receipt#: 306514
 Clerk: EN
 Rec Date: 09/18/2018 09:06:15 AM
 Doc Grp: D
 Descrip: DEED - SHERIFF
 Num Pgs: 6
 Rec'd Frm: SHERIFF LACKAWANNA COUNTY

Party1: VELARDI TERESA
 Party2: WILMINGTON SAVINGS FUND SOCIETY
 Town: CLARKS SUMMIT

Consideration: 1068.09
 Taxable Amount: 0.00
 Assessed Value: 21000.00

Recording:

Recording Fees - ROD	15.00
Cover/Index Page	2.00
Parcel Certification	10.00
State Writ Tax	0.50
State JCS/Access to Justi	40.25
Affordable Housing	13.00
County Improvement Fee	2.00
ROD Improvement Fee	3.00

Sub Total: 85.75

Transfer Tax	
STATE TRANSFER TAX	0.00
CLARKS SUMMIT BOROUGH	0.00
ABINGTON HEIGHTS SCHOOL D	0.00

Sub Total: 0.00

Total: 85.75

**** NOTICE: THIS IS NOT A BILL ****

I hereby CERTIFY that this document is recorded in the Recorder of Deeds Office of Lackawanna County, Pennsylvania.



Evelyn Rafalko McNulty

Evelyn Rafalko McNulty
 Recorder of Deeds

** Information may change during the verification process and may not be reflected on this page

Record and Return To:

SHERIFF LACKAWANNA COUNTY
 COURT HOUSE
 200 N. WASHINGTON AVE.
 SCRANTON PA 18503
 BOX 136

DEED

KNOW ALL MEN BY THESE PRESENTS, that I, MARK P. McANDREW, Sheriff of the County of Lackawanna, in the Commonwealth of Pennsylvania, for and in consideration of the sum of \$1,068.09 to me in hand paid, do hereby grant and convey to **Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as Trustee for Pretium Mortgage Acquisition Trust**,

ALL that certain lot, piece or parcel of land situate, lying and being in the **Borough of Clarks Summit, County of Lackawanna and Commonwealth of Pennsylvania**, designated and more specifically described in the attached

EXHIBIT "A"

COAL AND MINERALS excepted and reserved as in former deeds in chain of title of said premises.

IMPROVEMENTS thereon consist of a dwelling known as 612 Sunrise Street, Clarks Summit, Pennsylvania, having a Tax Parcel Number of 10014-020-01502 with an assessment value of \$21,000.00. The same having been sold by me on the 12th day of June, 2018, as Sale Number 55 of June 12, 2018, after due advertisement according to law, under and by virtue of a Writ of Execution issued on the 5th day of March, 2018 out of the Court of Common Pleas of the County of Lackawanna, Commonwealth of Pennsylvania, as Civil No. 2012-CIVIL-2460 at the suit of **Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as Trustee for Pretium Mortgage Acquisition Trust vs. Teresa Velardi**.

IN WITNESS WHEREOF, I have hereunto affixed my signature, this 13th day of SEPT, 2018.



Mark P. McAndrew, Sheriff

SHERIFF SALE # 55 of June 12, 2018

SALE DATE: June 12, 2018

PROPERTY LOCATION: 612 Sunrise Street, Clarks Summit, Pennsylvania

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF LACKAWANNA :

BEFORE me the undersigned Clerk of Judicial Records of the Court of Common Pleas of Lackawanna County, State aforesaid, personally appeared Mark P. McAndrew, Sheriff of Lackawanna County aforesaid, and in due form of law declared that the facts set forth in the foregoing Deed are true, and that he acknowledged the same in order that the said Deed might be recorded.

WITNESS my hand and seal of said Court this 13th day of September, 2018.

MAURI B. KELLY
CLERK OF JUDICIAL RECORDS
MY COMMISSION
EXPIRES FIRST MONDAY
OF JANUARY 2020

Mauri B. Kelly

Mauri B. Kelly

Clerk of Judicial Records

LACKAWANNA COUNTY
Certified Property Identification
MUNI: 08
AUG 30 2018
PIN: 10014 000 01/02
USE: 1000 ASSESS VAL 2/000
CLERK AN
1000

**BY VIRTUE OF A WRIT OF EXECUTION ISSUED BY PHELAN HALLINAN
DIAMOND & JONES, LLP
NO.: 12-CV-2460**

DESCRIPTION OF PROPERTY:

ALL that certain piece, parcel or lot of land situate, lying and being in the Borough of Clarks Summit, County of Lackawanna and State of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the Westerly corner of Northerly line of land of Cecil Clark. Said corner being South forty-eight degrees, 54 minutes West (S. 48 degrees 54 minutes W.) a distance of three hundred sixty-six and twenty-four one-hundredths feet (366.24 feet) from Southerly line of Sunset Street, formerly called Poplar Street; thence along another line of land of said Cecil Clark North forty-three degrees, thirty minutes West (N. 43 degrees 30 minutes W.) for a distance of one hundred thirty feet (130 feet) to a point; thence along line of land of now or formerly Bruno Marzanni North forty-eight degrees, fifty-four minutes East (N. 48 degrees 54 minutes E.) for a distance of one hundred five feet (105 feet) to a point; thence through the lands of Anthony Grigas and Mary A. Grigas; South forty-three degrees, thirty minutes East (S. 43 degrees 30 minutes E.) for a distance of one hundred thirty feet (130 feet) to a point; thence along line of land of aforesaid Cecil Clark South forty-eight degrees, fifty-four minutes West (S. 48 degrees 54 minutes W.) for a distance of one hundred five feet (105 feet) to a point, the place of beginning. Containing in all 13,638 square feet of land, more or less.

TOGETHER with the right in the Grantees, their heirs and assigns, to the uninterrupted and unobstructed use, in common with the Grantors, their heirs and assigns of a fifteen foot (15 foot) wide easement as it extends from the land hereby conveyed Northeastwardly, along line of land of now or formerly Bruno Marzanni, to Sunset Street for ingress, egress, and regress of persons, animals, vehicles and objects.

MAP ID# 100.14020015.02

The Grantees herein, in addition to the rights of easement granted hereinabove, have the further right to the use of the said easement for the laying, maintaining, repairing or replacing of sewer, water, electric service, lines and pipes, all as more particularly delineated with the map of said lots as recorded in Map Book 17, page 98, in the Office of the Recorder of Deeds in and for Lackawanna County. All rights and conditions where are not recited, shall pass with this grant.

Grantees, their heirs and assigns, tenants, sub-tenants, occupiers and possessors, take the within property subject to the obligation and duty to maintain the sewer lines running from the lot herein granted and passing adjacent to Lot 2 to Sunset Street jointly with the grantors, their heirs and assigns, tenants, subtenants, occupiers and possessors of Lot 2 as the same is plotted in plot recorded in Map Book 17 and page 98 and the premises heretofore conveyed by the Grantors and situate between Lot 2 and Sunset Street and it is further understood that the grantors, their heirs and assigns, tenants, sub-tenants, occupiers and possessors of Lot 2 in said plot shall each be responsible for 50% of all necessary charges and expenses which, from time to time accrue for paving, repairing, maintaining and cleaning said easement but excluding real estate taxes. This obligation shall run with the lot herein conveyed and shall further run with Lot 2 as now owned

by the grantors and the liability shall be imposed only upon then other owner of the lot herein conveyed and Lot 2 and shall run with the land.

AND

ALL that certain piece, parcel or lot of land situate, lying and being in the Borough of Clarks Summit, County of Lackawanna and Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the Southern-most corner of other land of Richard M. Phillips, et ux, being the Westerly corner of land herein, to be conveyed by Richard M. Phillips and Mary Ellen Phillips, on line of land of now or formerly Cecil R. Clark et ux; thence

Along the Easterly line of other land of said Richard M. Phillips and Mary Ellen Phillips, his wife, (grantors herein), South fifth-two degrees West (S. 52 degrees W.). For a distance of one hundred five feet (105 feet) to a point; thence

Through the land of Richard M. Phillips and Mary Ellen Phillips, his wife, (Grantors herein), North thirty-six degrees, eighteen minutes West (N. 36 degrees 18 seconds W.). For a distance of eighty-two and five-tenths feet (82.5 feet) to a point of land of now or formerly Cecil R. Clark and Rowena A. Clark; thence

Along another line of land of said Cecil R. Clark et ux North Fifty-two degrees East (N. 52 degrees E.) for a distance of one hundred five feet (105 feet) to a point; thence

Along another line of land of said Cecil R. Clark et ux South thirty-six degrees, eighteen minutes East, (S. 36 degrees 18 minutes E.) for a distance of eight-two and five-tenths feet (82.5 feet) to a point, the place of BEGINNING.

CONTAINING in all 8658 square feet of land, more or less.

TITLE TO SAID PREMISES IS VESTED IN Teresa Velardi, by Deed from Richard M. Phillips and Mary Ellen Phillips, his wife, Dated 08/27/2002, Recorded 08/28/2002, in Book 738, Page 874.

IMPROVEMENTS THEREON CONSIST OF RESIDENTIAL PROPERTY:

SEIZED IN EXECUTION AND TO BE SOLD AS THE PROPERTY OF Teresa Velardi

612 Sunset Street, Clarks Summit, PA 18411-2705

ASSESSMENT MAP # 1001402001502

JUDGMENT AMOUNT \$221,796.54

Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103

EXHIBIT **A**

REV-113 EX(2-13)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF REVENUE
BUREAU OF INDIVIDUAL TAXES
DEPT. 280603
HARRISBURG, PA 17128-0603

REALTY TRANSFER TAX STATEMENT OF VALUE

See Reverse for Instructions

RECORDER'S USE ONLY

State Tax Paid

Book Number

Page Number

Date Recorded

Inst # 201814786

9-18-18

Complete each section and file in duplicate with Records of Deeds when (1) the full value/consideration is not set forth in the deed, (2) the deed is without consideration, or by gift, or (3) a tax exemption is claimed. If more space is needed, please attach additional sheets. A Statement of Value (SOV) is not required if the transfer is wholly exempt from tax based on family relationship or public utility assessment. However, it is recommended that a SOV accompany all documents filed for recording.

A. CORRESPONDENT - All inquiries may be directed to the following person:

Name

Phelan Hallinan Diamond & Jones, LLP

Telephone Number:

215-563-7000

Mailing Address

1617 JFK Boulevard, Suite 1400, One Penn Center Plaza

City

Philadelphia

State

PA

ZIP Code

19103

B. TRANSFER DATA

Date of Acceptance of Document 6-12-18

Grantor(s)/Lessor(s)

Mark McAndrew, Sheriff

Telephone Number:

(570) 963-6719

Grantee(s)/Lessee(s)

WILMINGTON SAVINGS FUND SOCIETY, FSB,
D/B/A CHRISTIANA TRUST, NOT
INDIVIDUALLY BUT AS TRUSTEE FOR
PRETIUM MORTGAGE ACQUISITION TRUST

Telephone Number:

(888) 504-6700

Mailing Address

200 North Washington Avenue, 1st Floor

Mailing Address

15480 LAGUNA CANYON ROAD SUITE 100

City

Scranton

State

PA

ZIP Code

18503

City

IRVINE

State

CA

ZIP Code

92618

C. REAL ESTATE LOCATION

Street Address

612 SUNSET STREET, CLARKS SUMMIT, PA 18411-2705

City, Township, Borough

BOROUGH OF CLARKS SUMMIT

County

LACKAWANNA

School District

ABINGTON HEIGHTS S.D.

Tax Parcel Number

1001402001502

D. VALUATION DATAWas transaction part of an assignment or relocation? ☐ Y ☒ N

1. Actual Cash Consideration

\$ 1,068.09 (winning bid)

2. Other Consideration

+ -0-

3. Total Consideration

= \$ 1,068.09

4. County Assessed Value

\$ 21,000.00

5. Common Level Ratio Factor

X 6.67

6. Computed Value

= \$140,070.00

E. EXEMPTION DATA - Refer to instructions for exemption status.

1a. Amount of Exemption Claimed

= \$140,070.00

1b. Percentage of Grantor's Interest in Real Estate

100%

1c. Percentage of Grantor's Interest Conveyed

100%

2. Check Appropriate Box Below for Exemption Claimed.☐ Will or intestate succession

(Name of Decedent)

Estate File Number

☐ Transfer to a Trust. (Attach complete copy of trust agreement identifying all beneficiaries.)☐ Transfer from a trust. Date of transfer into the trust

If trust was amended attach a copy of original and amended trust.

☐ Transfer between principal and agent/straw party. (Attach complete copy of agency/straw party agreement.)☐ Transfer to the Commonwealth, the United States and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)☒ Transfer from mortgagor to a holder of a mortgage in default.

(Attach copy of mortgage and note/assignment)

☐ Corrective confirmatory deed. (Attach complete copy of the prior deed being corrected or confirmed.)☐ Statutory corporate consolidation, merge, or division (Attach copy of articles)☐ *Other (Please explain exemption claimed, if other than listed above.)

Under Penalties of law, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party

Melissa Connor

Date

6/14/18

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH APPLICABLE DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.

VERIFICATION

I, Christopher Spradling hereby state that I am Assistant Vice President of RUSHMORE LOAN MANAGEMENT SERVICES, LLC, servicing agent for Plaintiff in this matter. The Plaintiff has delegated the responsibility to RUSHMORE LOAN MANAGEMENT SERVICES, LLC for the property which is the subject of this action. Plaintiff lacks sufficient information to make this verification because Plaintiff is not the entity which maintains the business records for this property. RUSHMORE LOAN MANAGEMENT SERVICES, LLC is in possession and control of all documents and records supporting the statements in the foregoing complaint and therefore the servicer, rather than the Plaintiff, is the appropriate entity to make this verification.

I have reviewed the business records relating to this account, and am authorized to make this verification. I hereby verify that the statements made in the foregoing Civil Action in Ejectment are true and correct to the best of my information and belief. I understand that this statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

DATE: 10/10/2018

Name: Christopher Spradling
Assistant Vice President

Title: _____

RUSHMORE LOAN MANAGEMENT
SERVICES, LLC

File #:1024493

Name: TERESA VELARDI

PH # 1024493

Return to: Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
Attn: Eviction Department

PH # 1024493